

**MEMO ENDORSED****Federal Defenders  
OF NEW YORK, INC.**Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392David E. Patton  
Executive Director  
and Attorney-in-ChiefSouthern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

July 5, 2023

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 07/05/2023**BY ECF**Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York**Re: United States v. Jose Almonte  
12 Cr. 64 (VEC)**

Dear Judge Caproni,

I write to request an extension of time to file the defense's sentencing submission in connection with Jose Almonte's July 31, 2023 VOSR sentencing. This is the defense's first request for an extension. The parties' submissions are currently due July 10. I am instead requesting until July 18 to file submissions. I am scheduled to be out of town starting at the end of this week and through July 10, and need additional time to complete the defense submission. I have conferred with AUSA Jane Chong regarding this request, and I understand that she does not object. Thank you for consideration of this matter.

Respectfully submitted,  
/s/ Sarah Baumgartel  
Sarah Baumgartel, Esq.  
Assistant Federal Defender

cc: AUSA Jane Chong (by ECF)

Application GRANTED. The deadline for Defendant to file pre-sentencing submissions is hereby extended from Monday, July 10, 2023 to **Tuesday, July 18, 2023.**

SO ORDERED.

 07/05/2023HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE